



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

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October 5, 2005

David Phillips
Nevada Power Company
6226 West Sahara Avenue
MS 30
Las Vegas, NV 89102-3032

Subject: **Response to Corrective Action Plan**

Facility: Pond 4A, Reid Gardner Generating Station, Moapa, NV, Facility ID: H-000530

Dear Mr. Phillips:

The Nevada Division of Environmental Protection, Bureau of Corrective Actions (NDEP-BCA) has reviewed the *Corrective Action Plan for Pond 4A, Nevada Power Company, Reid Gardner Generating Station, Moapa, Nevada* (CAP) dated September 9, 2005. The CAP proposes the installation of an active groundwater remediation system, ash sediment removal, and groundwater monitoring for the remediation of the groundwater in the vicinity of Pond 4A. The groundwater remediation system will include a groundwater extraction system comprised of an interceptor trench and extraction well. The construction of the groundwater extraction system will be conducted in two phases: installation of the interceptor trench and installation of the extraction well. The extraction well will be installed after ash sediment removal has occurred in the proposed installation area. Based on the review of the CAP, the NDEP-BCA has the following exceptions, changes, conditions and/or comments:

- Ash sediment removal schedule should include timelines for ash sediment removal and groundwater monitoring well abandonment/reinstallation. Additionally, this schedule should include timelines for the removal of existing pond berms and the abandonment/reinstallation of the groundwater monitoring wells located within these berms.
- Updates on ash sediment removal shall be submitted monthly and contain, at a minimum, the following: approximate volume of ash sediment removed, approximate volume of ash sediment remaining, adherence to ash sediment removal schedule, discussion of any problems and/or delays of this schedule, a list of abandoned groundwater monitoring wells for the corresponding month, and a map scaled to the area surrounding Pond 4A that illustrates the approximate boundaries of the removal activities at the end of the corresponding month. The monthly updates should cover a calendar month and be submitted by the 10th day of the following month.
- Design plans for the conveyance of the water pumped from the groundwater extraction system to the reverse osmosis (RO) treatment system and design plans for the conveyance of the RO treatment system brine water to an evaporation pond shall be submitted to the NDEP-BCA for review prior to construction.

- Design plans for the RO treatment system including location of the system shall be submitted to the NDEP-BCA for review and comment prior to construction.
- Remedial system installation schedule should include timelines for installation of the trench system, installation of the extraction well, installation of the RO system, and remedial systems start-up activities.
- Updates for each phase of the installation of the groundwater extraction system shall be submitted monthly and contain, at a minimum, the following: discussion of any problems and/or delays of the schedule, revisions to the schedule, table of groundwater elevation, and a pieziometric surface map scaled to the area surrounding Pond 4A. The monthly updates shall commence when construction of each phase of the installation begins and shall continue until the commencement of system start-up activities. Additionally, the monthly updates should cover a calendar month and be submitted by the 10th day of the following month.
- Updates for the start-up of the groundwater extraction system shall be submitted weekly and contain, at a minimum, the following: discussion of any problems and/or delays in schedule, revisions to the schedule, table of groundwater elevations, and a pieziometric surface map scaled to the area surrounding Pond 4A. The submittal of the weekly updates shall commence after the installation of each phase of the groundwater extraction system has been completed and shall continue until the NDEP concurs that the system has obtained steady state conditions.

The NDEP-BCA has the following comments for the *Groundwater Remediation Plan, Pond 4A (95% Submittal)* dated August 30, 2005:

- Remediation Well Detail (page 3): Remove “~LANDFILL~” notation. The proposed installation location is not sited within a designated landfill.
- Typical Trench Section Detail (page 3): Clarify whether liner will be composed of HDPE or LDPE.

The NDEP-BCA has the following comments for the *Reid Gardner Pond 4A Remediation Pipeline, Technical Specification, Part II, 0381*:

- Section 5.0, first paragraph: Change “correction action plan” to “corrective action plan.”
- Section 6.1 and 6.7: Clarify whether fill for trench will be composed of washed pea gravel or washed drain rock. Correct corresponding plans to reflect fill type as necessary.
- Section 6.3: Change discharge location from Pond 4A to another permitted evaporation pond. Any groundwater pumped during construction activities should be discharged to a lined pond.

Please contact the undersigned with any questions or comments about this letter at (702) 486-2850 ext 240 or sharbour@ndep.nv.gov.

Sincerely,

David Phillips
Nevada Power Company
H-000530, Pond 4A, CAP Response
October 5, 2005
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SH:sh

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